



July 5, 2006

VIA EMAIL: shelby@niehs.nih.gov

Dr. Michael D. Shelby
CERHR Director
CERHR
79 T.W. Alexander Drive
Building 4401, Room 103
Research Triangle Park, NC 27709

Re: Comments on the NTP-CERHR Draft Brief on DEHP

Dear Dr. Shelby:

The American Chemistry Council Phthalate Esters Panel (PE Panel) submits these comments on the May 2006 Draft NTP Brief on the Potential Human Reproductive and Developmental Effects of Di(2-ethylhexyl) Phthalate (DEHP) ("Draft Brief"). The PE Panel appreciates the opportunity to submit these comments on the NTP CERHR Draft Brief.

For the reasons stated in the attached comments, and those stated in its previous comments, the PE Panel believes the overall conclusion is that the concern for risk to human reproduction from DEHP exposure is "minimal" and that the Draft Brief should state this. In addition, the PE Panel believes that a document intended to "provide clear, balanced, scientifically sound information," on the reproductive toxicity of DEHP should discuss the implications to the risk assessment of marmoset data showing that primates are likely much less sensitive to effects of DEHP than rodents; those implications being that the levels of concern based on rodent data indicated in the Draft Brief may be overstated, and at the least are very conservative. As for other specific findings in the Draft Brief, the PE Panel believes: 1) There is no evidence provided to suggest that the proportion of people exposed to DEHP reported in the 1999-2000 NHANES study underestimates actual exposures; 2) the response to the question "Can DEHP Affect Human Development or Reproduction?" should be changed from "Probably" to "Possibly"; and 3) the response to the question "Are current exposures to DEHP high enough to cause concern?" should be changed from "Yes" to "Possibly," with an explanation that any potential concern is restricted primarily to situations where infants may be exposed through certain medical treatments. The PE Panel hopes NTP CERHR will take these comments into consideration as it finalizes the DEHP Brief.



If you have any questions, or if you need any further information, please call Marian K. Stanley, Senior Director and Manager of the Phthalate Esters Panel, at (703) 741-5623, email her at marian_stanley@americanchemistry.com, or write her at the address below.

Sincerely yours,

A handwritten signature in black ink that reads "Hasmukh C. Shah". The signature is written in a cursive, flowing style.

Hasmukh C. Shah
Acting Vice President, CHEMSTAR